

SEP 23 2008

510(k) SUMMARY

The following 510(k) summary is being submitted as required by 21 CFR 807.92(a):

Submission Information

Contact: Seayoung Ahn
155 Gibbs Street, Suite 510, Rockville, MD 20850
Sponsor: Solco Biomedical Co., Ltd.
34-6 Keumam-ri, Seotan-myeon,
Pyeongtaek, Gyeonggi-do, 451-852
Republic of Korea
Date Prepared: May 3, 2008

Device Identification

Trade Name: 4CIS® SOLAR Spine System and
4CIS® APOLLON Spine System
Common Name: Pedicle Screw Spinal Fixation System
Classification Name: Spondylolisthesis Spinal Fixation Device System(MNH) per
21 CFR § 888.3070,
Spinal Pedicle Screw(MNI) per 21 CFR § 888.3070

Substantially Equivalent Predicate Legally Marketed Devices

The subject devices, 4CIS® VANE Spine System is substantially equivalent in function, design, composition, material and intended use to: **4CIS SOLAR Spine System and 4CIS APOLLON Spine System, K050471, May 22, 2005.**

The only reason for this Special 510(k) submission is to introduce additional sizes and shapes. There is no change in design, composition, material and intended use.

Solco Biomedical Co., Ltd

4CIS® SOLAR Spine System and 4CIS® APOLLON Spine System 510(k) Submission

Substantial Equivalence

The modified devices have the following similarities to those which previously received 510(k) concurrence:

- Have the same indicated use,
- Use the same operating principle,
- Incorporate the same basic design,
- Incorporate the same materials,
- Are packaged and sterilized using the same materials and processes.

In summary, the 4CIS SOLAR and 4CIS APOLLON Spine Systems described in this submission are substantially equivalent to the predicate device.

Device Modification Description

The purpose of this submission is to include the following components in 4CIS SOLAR Spine System and 4CIS APOLLON Spine System:

- Additional poly-axial pedicle screw sizes
- Additional rod sizes
- Additional insertion set instruments to be available for use

Device Description

The 4CIS[®] SOLAR Spine System and 4CIS[®] APOLLON Spine System are a top-loading multiple component, posterior spinal fixation system which consists of pedicle screws, rods, nuts, and a transverse (cross) linking mechanism.

The 4CIS[®] SOLAR Spine System and 4CIS[®] APOLLON Spine System will allow surgeons to build a spinal implant construct to stabilize and promote spinal fusion. 4CIS[®] SOLAR Spine System and 4CIS[®] APOLLON Spine System implant components are supplied non-sterile are single use and are fabricated from titanium alloy (Ti-6Al-4V ELI) that conforms to ASTM F136. Various sizes of these implants are available. Specialized instruments are available for the application and removal of the 4CIS[®] SOLAR Spine System and 4CIS[®] APOLLON Spine System.

Indications for Use

The 4CIS[®] SOLAR Spine System and 4CIS[®] APOLLON Spine System is a pedicle screw system indicated for the treatment of severe Spondylolisthesis (Grade 3 and 4) of the L5-S1 vertebra in skeletally mature patients receiving fusion by autogenous bone graft having implants attached to the lumbar and sacral spine (L3 to sacrum) with removal of the implants after the attainment of a solid fusion.

In addition, the 4CIS[®] SOLAR Spine System and 4CIS[®] APOLLON Spine System is intended to provide immobilization and stabilization of spinal segments in skeletally mature patients as an adjunct to fusion in the treatment of the following acute and chronic instabilities or deformities of the thoracic, lumbar and sacral spine: degenerative Spondylolisthesis with objective evidence of neurological impairment, fracture, dislocation, scoliosis, kyphosis, spinal tumor and failed previous fusion (pseudarthrosis).

Performance Data

Mechanical testing, as listed in **APPENDIX 8** that was conducted in accordance with ASTM F1717, demonstrates equivalence to the above predicate device and indicates that the products are as mechanically sound as the predicate device.



SEP 23 2008

Food and Drug Administration
9200 Corporate Boulevard
Rockville MD 20850

Solco Biomedical Company, Ltd.
% Mr. Saeyoung Ahn
155 Gibbs Street, Suite 510
Rockville, Maryland 20850

Re: K082453
Trade/Device Name: 4CIS® SOLAR Spine System and 4CIS® APOLLON Spine System
Regulation Number: 21 CFR 888.3070
Regulation Name: Pedicle screw spinal system.
Regulatory Class: Class II
Product Code: MNH, MNI
Dated: August 13, 2008
Received: August 25, 2008

Dear Mr. Ahn:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Page 2 – Mr. Saeyoung Ahn

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Center for Devices and Radiological Health's (CDRH's) Office of Compliance at (240) 276-0120. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding postmarket surveillance, please contact CDRH's Office of Surveillance and Biometric's (OSB's) Division of Postmarket Surveillance at (240) 276-3474. For questions regarding the reporting of device adverse events (Medical Device Reporting (MDR)), please contact the Division of Surveillance Systems at (240) 276-3464. You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at toll-free number (800) 638-2041 or (240) 276-3150 or the Internet address <http://www.fda.gov/cdrh/industry/support/index.html>.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Mark N. Melkerson", with a stylized flourish at the end.

Mark N. Melkerson
Director
Division of General, Restorative
and Neurological Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

K082453

Indications for Use

510(k) Number (if known):

Device Name: 4CIS[®] SOLAR Spine System and 4CIS[®] APOLLON Spine System

Indications for Use:

The 4CIS[®] SOLAR Spine System and 4CIS[®] APOLLON Spine System are a pedicle screw system indicated for the treatment of severe Spondylolisthesis (Grade 3 and 4) of the L5-S1 vertebra in skeletally mature patients receiving fusion by autogenous bone graft having implants attached to the lumbar and sacral spine (L3 to sacrum) with removal of the implants after the attainment of a solid fusion.

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(Division Sign-Off)

Division of General, Restorative,
and Neurological Devices

510(k) Number K082453

Prescription Use X

(Part 21 CFR 801 Subpart D)

AND/OR

Over-The-Counter Use _____

(21 CFR 801 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE OF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

Solco Biomedical Co., Ltd

4CIS[®] SOLAR Spine System and 4CIS[®] APOLLON Spine System 510(k) Submission